

February 27, 2003

Mr. Eric Larson
Clark Refining and Marketing, Inc.
6201 East Washington Street
Indianapolis, Indiana 46219

Re: Exempt Construction and Operation Status,
097-15281-00341

Dear Mr. Larson,

The application from Clark Refining and Marketing, Inc., received on December 6, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following soil and groundwater remediation system located at Clark Refining and Marketing, Inc., Indianapolis, Indiana 46219 is classified as exempt from air pollution permit requirements:

The source consists of the following process/equipment:

- (a) One (1) Travini TRO 400S Dynaseal Pump (Emission Unit ID #1), with a maximum operating capacity of 380 acfm, and a maximum hydraulic operating capacity of 35 gpm.
- (b) One (1) ESI (LP 1504) Air Stripper (Emission Unit ID #2), with a maximum operating capacity of 150 gpm.
- (c) One (1) Newberry Tanks (300 GBKT 300 DW) LPH Storage Tank (Emission Unit ID #3), with a maximum capacity of 280 gal.

Pursuant to 326 IAC 2-1.1-3 (d)(1)(H), sources emitting less than one(1) ton per year of a single hazardous air pollutant (HAP) or two and five-tenths (2.5) tons per year of any combination of HAPs listed pursuant to section 112(b) of the CAA are exempt from the registration and permitting requirements of 326 IAC 2.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source. The source may operate according to 326 IAC 2-1.1-3.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oliger at (317) 327-2846 or aoliger@indygov.org.

Sincerely,

Original Signed by Jon B. Chavez
John B. Chavez, Administrator
Office of Environmental Services
City of Indianapolis

Attachment

aco

cc: File , Marion County
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Angelique Oliger

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Clark Refining and Marketing, Inc.
Source Location: 6201 E. Washington Street, Indianapolis, Indiana 46219
County: Marion
SIC Code: 5541
Operation Permit No.: 097-15281-00341
Permit Reviewer: Angelique Oliger

The City of Indianapolis Office of Environmental Services (OES) and the Office of Air Quality (OAQ) have reviewed an application for an exemption, from Clark Refining and Marketing, Inc. for the soil and groundwater remediation project.

The remediation process will involve emissions from an air stripper and a high vacuum pump. The emission from both pieces of equipment will contain hazardous air pollutants. However, through the application process for this remediation, Clark Refining and Marketing, Inc. has submitted justification that the remediation activities do not meet the criteria for an air permit and thus, should receive an exemption.

This remediation project will be reviewed/permitted as an exemption.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following process/equipment:

- (a) One (1) Travini (TRO 400S) Dynaseal Pump (Emission Unit ID#1), with a maximum operating capacity of 380 acfm, and a maximum hydraulic operating capacity of 35 gpm.
- (b) One (1) ESI (LP 1504) Air Stripper (Emission Unit ID#2), with a maximum operating capacity of 150 gpm.
- (c) One (1) Newberry Tanks (300GBKT 300 DW) LPH Storage Tank (Emission Unit ID#3), with a maximum capacity of 280 gallons.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 098-0341-01, issued on December 2, 1998.

All conditions from previous approvals were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1	Dynaseal Pump	10	0.33	380	70-75
2	Air Stripper	10	0.5	800	70
4	Storage Tank	10	0.103	variable	70

Enforcement Issue

There are not enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 6, 2001. No additional information was received.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential To Emit (tons/year)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	0.03
CO	Negligible
NO _x	Negligible

HAP's	Potential To Emit (tons/year)
Benzene	0.0023
Toluene	0.0046
Ethylbenzene	0.0046
Xylenes	0.01394
MTBE	0.0046
TOTAL	0.030

- (a) The potential to emit (as defined in 326 IAC 2-7-1 (29)) of the pollutants are less than the levels listed in 326 IAC 2-1.1.3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OES and OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Negligible
PM-10	Negligible
SO ₂	Negligible
VOC	0.030
CO	Negligible
NO _x	Negligible
HAP (specify)	Negligible

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO_x, Ozone, CO, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	N/A
PM ₁₀	N/A
SO ₂	N/A
VOC	0.03
CO	N/A
NO _x	N/A

- (a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Only sources required to obtain a permit are required to prepare and maintain a Preventive Maintenance Plan (PMP). The potential to emit regulated air pollutants appears to be below any minimum permitting threshold or permitting provisions found in 326 IAC 2-1.1-2 (Permit Review Rules: General Provisions; Applicability).

326 IAC 2-4.1 (HAPs Major Sources; New Source Toxics Control)

This source has the potential to emit of less than ten (10) tons per year of single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO_x and/or VOC in Marion County and less than one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6 (Particulate Rules)

- (a) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6-1 does not apply to this source.
- (b) 326 IAC 6-3 Applicability. This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source.

326 IAC 7 (Sulfur Dioxide Rules)

This source does not have any emission unit with the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7 does not apply to this source.

326 IAC 8 (Volatile Organic Compound Rules)

- (a) The potential to emit of the vacuum pump and air stripping emission units and is less than 25 tons per year therefore, 326 IAC 8-1-6 does not apply.
- (b) There are no other 326 IAC 8 rules applicable to source.

Conclusion

The construction and operation of this soil and groundwater remediation project shall be subject to the conditions of the attached exemption number 097-15281-00341.